1	Josh A. Cohen (SBN 217853) CLARENCE DYER & COHEN LLP		
2	899 Ellis St. San Francisco, CA 94109 Tel: (415) 749-1800		
3			
4	Fax: (415) 749-1694 jcohen@clarencedyer.com		
5	Attorney for Defendant		
6	SOK WA CHONG VISEU		
7			
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11	UNITED STATES OF AMERICA,	CASE NO. CR-10-0565 JSW (EDL)	
12	Plaintiff,	STIPULATION AND [PROPOSED]	
13	v.	ORDER AUTHORIZING TEMPORARY RELEASE OF PASSPORT TO COUNSEL	
14	SOK WA CHONG VISEU,		
15	Defendant.		
16			
17	CTIDIH ATION		
18	STIPULATION  Defendent Selv We Chang Visey has been an protried release since her initial enpearance		
19	Defendant Sok Wa Chong Viseu has been on pretrial release since her initial appearance		
20	before the magistrate court on August 2, 2010. As a condition of her release, Ms. Viseu was		
21	required to surrender her United States passport to Pretrial Services. A further condition is that  Ms. Viscou not travel outside the United States without the permission of the Court		
22	Ms. Viseu not travel outside the United States without the permission of the Court.  Ms. Viseu's passport has expired. Passuss Ms. Viseu's alderly and siling mother resides.		
23	Ms. Viseu's passport has expired. Because Ms. Viseu's elderly and ailing mother resides		
24	in Macau, near Hong Kong, Ms. Viseu wishes to renew her passport so that she can travel to visit		
25	her mother on short notice (with the Court's permission). In order to renew her passport, Ms.  Viseu must surrender her expired passport to the National Passport Processing Center.		
26	viscu must surrender ner expired passport to the	rvational Lassport Libressing Center.	
27			
28			

Case No. CR-10-0565 JSW

STIPULATION MODIFYING CONDITIONS OF RELEASE

Accordingly, Ms. Viseu wishes to obtain her expired passport from Pretrial Services in order to submit it to the National Passport Processing Center for renewal. Upon receiving a new passport, Ms. Viseu will surrender it to Pretrial Services.

Neither Pretrial Services nor the government objects to the temporary release of Ms.

Viseu's passport for the purpose described above, provided that the passport is released to defense counsel and defense counsel submits the passport directly to the National Passport Processing Center for renewal.

The parties thus agree and stipulate that Pretrial Services should be directed to produce Ms. Viseu's passport to undersigned defense counsel, and that defense counsel should thereafter deliver the passport to the National Passport Processing Center by mail along with an application for renewal. The parties further agree and stipulate that upon receiving a replacement passport, Ms. Viseu or her counsel shall deliver the passport to Pretrial Services within 48 hours.

IT IS SO STIPULATED.

DATED: January 3, 2013

/s/ Josh Cohen

JOSH COHEN

Attorney for OLGA VISEU

 $\|_{\mathcal{D}}$ 

DATED: January 3, 2013

/s/ Deborah Douglas

DEBORAH DOUGLAS

Assistant United States Attorney

## **ORDER**

By stipulation of the parties, and for good cause shown, it is hereby ORDERED that Pretrial Services shall return defendant Sok Wa Chong Viseu's passport to her counsel, Josh Cohen. Defense counsel shall deliver the passport directly to the National Passport Processing Center via mail for the sole and exclusive purpose of renewing the passport. Upon completion of this process and receipt of a new passport, Ms. Viseu or her counsel shall deliver the passport within 48 hours to Pretrial Services.

1	All other conditions of release shall remain in effect.	
2	IT IS SO ORDERED.	81.001
3	DATED: <u>January 7</u> , 2013	Elizah P. D. Lapote
4		ELIZABETH D. LAPORTE UNITED STATES MAGISTRATE JUDGE
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
<i>- 1</i>		

28